

# **EXHIBIT F**

AFFIDAVIT

COMMONWEALTH OF VIRGINIA  
AT LARGE:

I, the undersigned, a Notary Public in and for the Commonwealth of Virginia at Large do hereby certify that DREWRY WILLIAM CARTER made statement under oath as follows:

1. My name is DREWRY WILLIAM CARTER, and I reside at 359 Wright Road, Ridgeway, Virginia 24148. I am over eighteen (18) years of age, of sound mind, capable of making this Affidavit , and am personally acquainted with the facts herein stated.

2. My social security number is 226-60-4188, and my date of birth is April 25, 1946.

3. On or about March 25, 2008, a left lung pleura biopsy revealed fibrosis, chronic inflammation, and atypical mesothelial hyperplasia. On or about September 18, 2008, a second left lung pleura biopsy was performed by D. Patrick Burney, M.D., and I was diagnosed as having malignant mesothelioma. This diagnosis was communicated to me by Dr. Burney following the biopsy procedure. Since receiving this diagnosis, I have been treated and followed by Dr. Kenneth Karb, who is my treating oncologist. I am currently taking medications prescribed by my doctors, but these medications do not affect my memory or ability to give this true and accurate statement.

4. I was shocked when I received the diagnosis of mesothelioma.

5. My wife and I were married on December 23, 1963, in Rockingham County, North Carolina. We will celebrate our 45<sup>th</sup> wedding anniversary this year. I have remained married to and have resided with my wife from the time that we were married until today. I have one son, William ~~Tracy~~ Carter, who was born on April 22, 1966. My son, William, currently lives in Wirtz, Virginia, and regularly visits with me.

6. From 1962 to 1963, I was employed by Pannel Knitting Mill in Martinsville, Virginia, as a production worker. From 1963 to 1967, I was employed by

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the United States Navy as an aviation jet mechanic. I was stationed in Quonset Point, Rhode Island and was assigned to The Essex, Lake Champlain and USS Wasp. From May 1967 to August 1967, I was employed by the Newport News Shipyard as a pipe fitter. For approximately one month in 1967, I was employed by Spray Cotton Mills in Eden, North Carolina, as a production worker. From 1967 to 1972, I was employed by Fieldcrest Karstan Mill in Eden, North Carolina, as a mechanic and supervisor. From 1972 to 1974, I was employed by Chan Stan Mobil Station in Eden, North Carolina, as a manager. In 1964, for approximately six months, I was employed by B&W Construction at the DuPont plant in Martinsville, Virginia, as a millwright. From 1974 to 1975, I was employed by Carolina Crane at the Coca-Cola USA plant in Greensboro, North Carolina, as a millwright. From 1975 to 1978, I was employed by Goodyear Tire & Rubber Co. in Danville, Virginia, as a mechanic. From 1978 to 2002, I was employed by Miller Brewery at the Miller plant in Eden, North Carolina, as an industrial mechanic.

7. Throughout my employment as stated above, I was in regular contact with asbestos containing materials as my job tasks required.

8. Additionally, these tasks were regularly performed in the direct vicinity of insulating trades, including other pipe fitters, insulators, millwrights, welders and mechanics. I was continually exposed to the dust created by the other insulating trades' work.

9. During my years of employment as stated above, I specifically recall the use of the asbestos-containing products listed on Exhibit A.

10. Additionally, I specifically recall the following co-workers at the DuPont plant in Martinsville, Virginia, and believe that they have also been exposed to asbestos-containing products: William H. Black, William H. Bousman, Jr., Edward E. Compton, George R. Heffinger, David T. Tatum, Maynard Thompson, Ernest N. Williams, Noel L. Wood and James A. Cox.

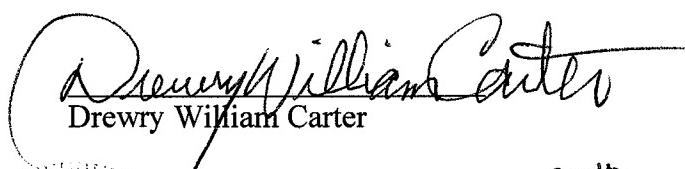
11. I specifically recall the following co-worker at Miller Brewing in Eden, North Carolina, and believe that he has also been exposed to asbestos-containing products: Frank Webb.

Initials DAC

12. At no time during my employment, as stated above, was I given any protective respiratory equipment specifically to minimize or prevent exposure to the dust created from the use of asbestos-containing materials.

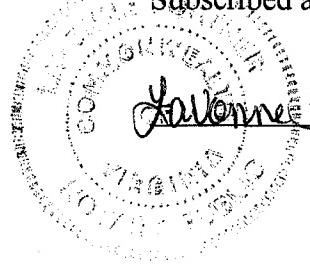
13. At no time during my employment, as stated above, was I warned that breathing asbestos dust from the products I used and/or from the products being installed around me could be hazardous to me.

AND FURTHER THE AFFIANT SAYETH NOT.



Drewry William Carter

Subscribed and sworn before me this 27<sup>th</sup> day of October, 2008.



Yolonne Fortner Commission ID No.: 355871  
Notary Public My Commission Expires: 01/31/2009

**EXHIBIT A**  
**DREWRY WILLIAM CARTER**

The following list includes, but is not limited to, asbestos-containing products identified by DREWRY WILLIAM CARTER, during his employment as stated above. Mr. Carter reserves the right to supplement this list should he recall further details regarding his exposure to asbestos.

**AMCHEM (BENJAMIN FOSTER)**

Flame resistant high velocity duct sealant  
Heat resistant sealant  
FOAMSEAL sealant

**ANCHOR PACKING COMPANY**

Anchor packings and/or gaskets  
Anchor rope, wick, tape  
Brakelinings  
Ankorite packing, gaskets, sheets  
Ankotallic gaskets

**A.C. AND S., INC. (ARMSTRONG CONTRACTING & SUPPLY**

Armstrong thermasil pipecovering and block  
Armstrong kaytherm pipecovering and block  
High temperature pipecovering and block

**ASBESTOSPRAY CORPORATION**

Cements  
Adhesive

**A.W. CHESTERON**

Packing  
Gaskets  
Chesterton Style 315 Carson

**BABCOCK & WILCOX BOILERS**

Boilers  
Rope packings  
Furnaces with Asbestos Lining Ka wool blankets

**CELOTEX (PHILIP CAREY)**

Celotex asbestos roof coating

**DANA CORPORATION**

Victor sheet gaskets  
Asbestos/Steam gaskets

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**FLEXITALIC**

Spiral wound industrial gaskets

**FLINTKOTE**

Asbestos vinyl floor tile

Dry joint compound

Plastic cement

**FORTY-EIGHT INSULATIONS**

Quik-Set cement

High temperature bonding cement

**FOSTER WHEELER**

Pipemaking and block

**GAF CORPORATION (RUBEROID)**

Asbestos paper

T/NA-100 insulation jacketing

**GARLOCK**

Garlock gaskets

Garlock sheet gasket material

Garlock rope

Garlock packing

Garlock asbestos & rubber packing

Woven asbestos gasketing cloth style 604

**GENERAL ELECTRIC**

Turbines

O.N.C. (asbestos insulated cable)

**GEORGIA PACIFIC CORPORATION**

Ready mix joint compound

**H.K. PORTER (SOUTHERN ASBESTOS COMPANY)**

Asbestos cloth, tape

**INGERSOLL-RAND**

Air compressors

Gaskets

**JOHNS-MANSMVILLE SALES CORPORATION**

Johns-Manville pipemaking

Johns-Manville gaskets

Johns-Manville cement

Initials DAC

**KEASBY & MATTISON**

Pipecovering

**KEENE CORPORATION (B & H AND BEH)**

Powerhouse cement

**MINNESOTA MANUFACTURING & MINING CO. (3M)**

3M sandpaper

3M cement

3M packing

3M masks

**MOBIL OIL**

Dumdum

**NATIONAL GYPSUM COMPANY**

Gold Bond products

**OWENS-CORNING FIBERGLAS CORPORATION**

Kaylo pipecovering

**OWENS-ILLINOIS**

Kaylo pipecovering

**RAYBESTOS-MANHATTAN**

Asbestos felt

Rope

Brakeshoe lining (Red Demon)

Tape

Cloth

**RILEY STOKER**

Boilers

**RUST ENGINEERING: (PEABODY)**

Asbestos cloth

Asbestos gaskets

Asbestos packing-seals-rope

**SEPCO CORPORATION**

Gaskets

Packing

**UNARCO**

Unibestos pipecovering and/or block

Initials 

**UNIROYAL**

Cloth

Gaskets and packings

**WESTINGHOUSE**

Westinghouse motors

Westinghouse switch gears

Westinghouse breakers

Westinghouse bus ways

Westinghouse relays

Westinghouse packing

**W.R. GRACE**

Super-40 perlite

**WORTHINGTON**

Pumps

**SUPPLIERS/DISTRIBUTORS OF ASBESTOS PRODUCTS**

WACO, Inc.

In addition to the specific products listed above, claimant also recalls using the following types of asbestos products:

Asbestos Floor Tile, Roofing Tile, Gaskets, Tape, Curtains, Pipeline Felts, Paper, Rope, Fabric or Cloth, Pipecovering, Pipecovering and Block, Boiler Jackets, Fireproofing, Handhold Gaskets.

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